

**From:** Walter Lamb [landtrust@ballona.org]  
**Sent:** 2/26/2019 7:12:10 PM  
**To:** Ballona Wetlands [landtrust@ballona.org]  
**Subject:** Affirmation vs Accountability in SMBRC management

Dear Governing Board members,

Bay Restoration Plan projects that are performing below expectations are the ones most in need of your policy-making attention, but also the ones you are least eager to discuss. Difficult but solvable problems are less likely to be identified, let alone addressed, if you filter out information that does not reaffirm your existing perspectives. An appetite only for positive news also encourages conclusions that may outpace what is supported by the actual data. Basic scientific principles like "correlation does not equal causation" seem to get lost in the rush to attribute various wildlife sightings to certain projects, even when the data seems to suggest otherwise.

I understand that many of you take exception to the manner in which the Land Trust has pursued our mission over the years. Obtaining public records, enforcing public interest laws, and rebutting dubious PR narratives has not endeared us to various agencies and entities. Nonetheless, our board has determined that those actions remain necessary to protect the Ballona Wetlands ecological reserve from ongoing threats, whether in the form of special interest projects that encroach on the reserve, questionable management policies that seem based on political expediency, or agencies that claim to have less power than they actually have to help affect positive change. We are always open to constructive feedback on how we can more effectively communicate our goals, but we won't accept business as usual for a valuable ecosystem that remains largely neglected and inaccessible 15 years after its acquisition. Nor will we join you in pretending that SMBRC can't advise precisely the type of state program its enabling legislation calls on it to advise, or that over a decade of historical records documenting SMBRC's prior involvement with restoration planning are just incorrectly worded references to the Bay Foundation. However you may feel about our positions, visible expressions of derision during public comment are neither productive nor appropriate, and I appreciate the polite manner in which most of you receive public comment.

It is true that a large volume of comments were submitted in response to the draft environmental analysis for the wetlands. This is because numerous issues that SMBRC was well-positioned to address earlier in the process were instead allowed to become bigger issues. The most challenging comments for the project team to address are those submitted by neutral government agencies like the Coastal Commission, US Fish and Wildlife Service and National Marine Fisheries Service, and by supportive non-profit organizations that nonetheless raised important concerns. It is hard to imagine how a document that took so many years to prepare could still have inadequate mitigation for what is arguably the signature species of the ecological reserve (Belding's Savannah Sparrow). Fixing this shortcoming at this very late stage of the planning process will lead to further delays and additional ripple effects in the overall plan (for instance, the entire second phase of Alternative 1 is dependent on Belding's Savannah Sparrow adopting newly created habitat). In coordinating the restoration planning, SMBRC staff worked as members of the project team on issues like mitigation, two controversial special interest proposals, native re-vegetation plans, the range of alternatives, and many other important issues. But after initially pledging the Governing Board's involvement, you allowed yourselves to be sidelined when the project became politically uncomfortable, and this left a local agency vacuum that has resulted in real and ongoing harm to the planning process. Remarkably, you did not even submit a single comment in response to the draft analysis.

From a governance perspective, it is not normal for the governing body of a state agency to be so openly disinterested in the operational capacity, policy influence, financial resources, legal liability, or public visibility

of that agency. The meetings run by TBF's facilitator have been designed to navigate around these issues, rather than address them head on. So we are once again in an all-too familiar circumstance where it appears that our only avenue is to seek judicial determinations on the issues we have raised. We can only hope that this process will finally bring some closure to these important issues of the public interest.

Regards,

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